

Conor Huseby  
Assistant Federal Public Defender  
101 SW Main Street, Suite 1700  
Portland, OR 97204  
Tel: (503) 326-2123  
Fax: (503) 326-5524  
Email: conor\_huseby@fd.org

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:22-cr-00046-HZ

Plaintiff,

DECLARATION OF COUNSEL IN  
SUPPORT OF UNOPPOSED MOTION  
TO CONTINUE TRIAL DATE

v.

FAYAO RONG,

Defendant.

---

I, Conor Huseby, being duly sworn, hereby depose and say:

1. I represent the defendant, Fayao Rong, in the above-captioned case.
2. Mr. Rong is charged with conspiracy to manufacture marijuana and conspiracy to possess with the intent to distribute marijuana in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846. Mr. Rong is out of custody on this case in compliance with the terms of his pretrial release.

3. Trial in this matter is currently set for Tuesday, May 3, 2022. This is the first trial setting and the first motion to continue this case filed by either party.

4. This case involves a large marijuana conspiracy. The parties are working towards a resolution of this case. However, additional time is needed to consult with Mr. Rong, finalize the resolution and, should a resolution not take place, prepare for trial.

5. Denial of a continuance would deny the defense the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(A).

6. I have discussed this request for a continuance with Assistant United States Attorney Kemp Strickland. The government does not oppose the request.

7. I have spoken with Mr. Rong and explained the reasons supporting his request for a continuance and the rights he has under the Speedy Trial Act. Mr. Rong waives his rights under the Speedy Trial Act for purposes of this set-over and respectfully requests a continuance of the current trial date for approximately 90 days.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED this 26th day of April, 2022.

/s/ Conor Huseby

Conor Huseby  
Attorney for Defendant